

REMARKS

Claims 1-55 are pending.

Claims 14-55 have been previously withdrawn and are now cancelled without prejudice or disclaimer of the subject matter recited therein.

Claims 1-4, 6, 7, 10, 12, and 13 have been amended. Claim 1 has been amended for clarity to replace “process” with “method” to provide proper antecedent basis for claims depending directly or indirectly from claim 1. Claims 3, 4, 6, 7, 10, 12, and 13 have been amended for clarity for proper antecedent basis in view of amendments to claim 1.

Claims 56-84 have been added.

Specification

The Specification has been amended to correct a minor informality. No new matter has been added.

Claim Rejections - 35 U.S.C. § 112

Claims 1-13 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicants respectfully request withdrawal of the rejection.

Claim 1 has been rejected because, “It is not clear what the cope of facilitating goal alignment is.” Office Action, para. 3. Applicants have amended Claim 1 to remove reference to “facilitating”. Claim 1 now recites, in relevant part, “determining content for a user interface, based on the first and second rules, such that the content ~~facilitates goal alignment~~ directs a user of the user interface in generation of content of a secondary goal of the second goal type that causes alignment of the secondary goal with the primary goal of the first goal type.” Claim 1 (shown as amended). Applicants respectfully submit that amended claim 1 complies with the requirements of 35 U.S.C. § 112, second paragraph.

Claim 2 has been rejected upon the same basis as claim 1, i.e. recitation of “activating a wizard that facilitates goal modification.” Claim 2. Applicants have amended Claim 2 to remove reference to “facilitating”. Claim 2 now recites, in relevant

part, “activating a wizard ~~that facilitates goal modification.~~” Claims 2 (shown as amended).

Claims 3-13 stand rejected for depending upon rejected Claims 1 and 2.

In view of the amendments, Applicants respectfully request withdrawal of the rejection.

Claim Rejections - 35 U.S.C. § 102

Claim 1 stands rejected under 35 U.S.C. § 102(a) as being anticipated by the Meyer article “eWorkbench: Real-Time Tracking of Synchronized Goals” (hereinafter “*Meyer*”) and “Making Reviews More Efficient and Fair” (hereinafter “*Dutton*”). Applicants respectfully traverse the rejection.

Meyer and *Dutton* both relate to goal tracking software. The present invention includes “determining content for a user interface[] based on first and second rules.” Claims 1, 57, and 71. Applicants respectfully submit that *Meyer* and *Dutton* do not teach that “the content [of the user interface] **directs a user** of the user interface **in generation of content of a secondary goal** of the second goal type **that causes alignment of the secondary goal with the primary goal of the first goal type.**” *Id.* (emphasis added).

Meyer teaches that eWorkbench allows workers to align goals with a manager’s goals by “clicking on the “Align” button” of the eWorkbench goal-tracking system. However, to generate content of a goal, *Meyer* teaches the eWorkbench simply prompts a user to enter goal information. For example, *Meyer* teaches that eWorkbench uses a web-based template and prompts a user to “enter a goal title”, “enter “Mileposts””, a “weight”, a “due date”, “evaluation criteria”, etc. However, the present invention does not simply prompt a user to enter goal related information. The present invention includes a user interface whose content “**directs a user** of the user interface **in generation of content of a secondary goal** of the second goal type **that causes alignment of the secondary goal with the primary goal of the first goal type.**” Claims 1, 57, and 71. Applicants respectfully submit that ‘prompts to enter goal related data’ as taught by *Meyer* do not “**direct[]** a user ... in generation of a secondary goal **that causes alignment** of the

secondary goal with the primary goal.” Applicants respectfully submit that there is no causal function taught by *Meyer* that “causes alignment” of the goals entered by the worker and the manager. The worker’s and manager’s goals may or may not be aligned, but, in any event, *Meyer* does not teach that eWorkbench includes any alignment causality.

Dutton teaches that employees and managers can design goals and that an application can depict the alignment of goals. However, Applicants respectfully submit that, like *Meyer*, *Dutton* fails to teach or suggest any causal function that “causes alignment” of goals. Accordingly, Applicants respectfully submit that *Dutton* also fails to teach or suggest a user interface whose content “**directs a user of the user interface in generation of content of a secondary goal of the second goal type that causes alignment of the secondary goal with the primary goal of the first goal type.**” Claims 1, 57, and 71.

Accordingly, Applicants respectfully request withdrawal of the rejection of Claim 1.

Claim Rejections - 35 U.S.C. § 103

Claims 2-8 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Meyer* and *Dutton* in view of CultureWorx, as disclosed in *Dutton*, and “Power-Charging People’s Performance” (referred to herein as “*Elliot*”). Applicants respectfully traverse the rejection.

Dutton teaches that CultureWorx allows communication and administration of incremental sales and rewards programs. *Dutton*, para. 23. “Coaching is also an integral part of Quill’s program.” *Id.*, para. 24. The coaching to by *Dutton* relates to managers coaching employees about the employee’s performance. More specifically, “For managers, such realtime, continuous-feedback systems can help them provide specific performance information before ineffective behaviors become bad habits.” *Id.*, para. 25.

Elliot reiterates the importance of an organization’s ability to effectively communicate organization goals.

Applicants respectfully submit that for the foregoing reasons in the previous rejection and based upon the teachings of *Dutton* and *Elliot* that *Meyer* and *Dutton* in view of *Elliot* do not teach or suggest, a user interface whose content “**directs a user of the user interface in generation of content of a secondary goal of the second goal type that causes alignment of the secondary goal with the primary goal of the first goal type**” as recited in Claims 1, 57, and 71.

Since Claims 2-8 depend upon Claim 1 and *Meyer* and *Dutton* in view of *Elliot* do not teach or suggest Claim 1, Applicants respectfully request withdrawal of the rejection of Claims 2-8.

Applicants respectfully submit that new independent Claims 57 and 71, along with claims directly or indirectly depending thereon, are allowable for at least the same reasons as Claim 1.

CONCLUSION

In view of the amendments and remarks set forth herein, Applicant respectfully submits that all pending claims are in condition for allowance. Accordingly, Applicant requests that a Notice of Allowance be issued. Nonetheless, should any issues remain that might be subject to resolution through a telephone interview, the Examiner is requested to telephone the undersigned at 512-338-9100.

ELECTRONICALLY FILED
November 7, 2006

Respectfully submitted,

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